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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224067
Party	Defendant Tielsa GmbH
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Date	11/05/2015
Attachments	PA_26082015_USPTO_Response_Office_Action.pdf(22139 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Matter of:

Larry Paletz,
Opposer,
v.
Tielsa GmbH,
Applicant

Opposition No: 91224067
Serial No: 79143534

11/05/2015

MOTION TO EXTEND TIME TO ANSWER

Applicant Tielsa GmbH ("Tielsa"), through the undersigned counsel, hereby submits this Motion to Extend Time to Answer pursuant to Fed. R. Civ. P. 6(b), made applicable to TTAB proceedings by 37 C.F.R. § 2.116(a), and T.B.M.P. §§ 310.03(c) and 509.

In support of its Motion, Tielsa shows the Board that good cause for this extension is shown as follows:

1. On September 26, 2015, Larry Paletz ("Paletz") filed its Notice of Opposition to Tielsa's trademark application (Serial No. 79143534) for Tielsa.
2. Tielsa deadline to file its Answer is Thursday, November 05, 2015. The time for Tielsa to file its Answer has not yet expired and this is the first extension requested in this case.
3. The events listed by the opposing party in the pleading took place partially during the years before 2005 and therefore more than 10 years ago. Applicants must perform extensive research in the archives and search for former employees to verify the allegations. This was not possible in the short time available.
4. Between the parties of this proceeding negotiations are ongoing to find a settlement but they are in an early stage.
5. This Motion is not necessitated by a lack of diligence or unreasonable delay by Tielsa.
6. Tielsa attempted to confer with Paletz regarding this stipulation, but did not receive a response as to whether it would consent by the time of this filing.

For the foregoing reasons, good causes exist to extend the time in which Tielsa has to file its answer by thirty (30) days—through December 4, 2015.

Respectfully submitted this 5th day of November, 2015

Respectfully submitted,

Tielsa GmbH

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Motion to Extend Time to Answer has been served on the following by mailing said copy on November 5, 2015, via electronic mail and First Class Mail, postage prepaid:

LARRY PALETZ
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